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This case is in harmony with the current of modern decisions. It was said in the older books that "Necessaries consist only of food, drink, clothing, washing, physic, instruction and a suitable place for residence." *Thorpe v. Shapleigh*, 67 Me. 235. The modern view is opposed to any arbitrary limitations by schedule, and recovery for legal services is commonly allowed. In *Conant v. Burnham*, 133 Mass. 303, 43 Am. Rep. 532, a husband was held liable for legal services rendered to his wife in successfully defending her against a complaint instituted against her by him for being a common drunkard. In accord is *Warner v. Heiden*, 28 Wis. 517, 9 Am. Rep. 515. But in *Ray v. Adden*, 50 N. H. 82, 9 Am. Rep. 175, an attorney who represented defendant's wife in an action brought against her for divorce, which was dismissed without prejudice, was not allowed to recover for his services. Where the wife sues for an absolute divorce her attorney commonly cannot recover from her husband, *Shelton v. Pendleton*, 18 Conn. 417; *Daw v. Eyster*, 79 Ill. 254. But where the proceedings are instituted upon reasonable grounds for a judicial separation only, recoveries for services are usually allowed. *Rice v. Shepherd*, 12 E. C. (N. S.) 332.

HUSBAND AND WIFE—CAN A MARRIED WOMAN BE A VAGRANT.—A married woman who lived with her husband about one-half of the time was convicted of vagrancy. On appeal the court said that the husband represents the "visible means of support" to which the statute refers and that although he is not shown to be able to support her and she is shown to be able to work and does not, yet she cannot be convicted of vagrancy. *Brown v. State* (Ga. 1913), 79 S. E. 1133.

This case emphasises the legal duty of the husband to support his wife. In the principal case the court said: "In the present state of the law the burden of supporting the family falls upon the husband, in return for which the law crowns him with the proud but meaningless title of 'head of the family.' If he would wear the crown he must bear the burden. Some day all this may be changed, but we are dealing with present-day law, and 'sufficient unto the day is the evil thereof.'" In *Taylor v. State*, 59 Ala. 19, it was held that a minor supported by her parents who have an honest occupation cannot be convicted of vagrancy although she may be a lewd woman. A common prostitute as such cannot be convicted of being a vagrant. Vagrancy is a statutory offense and the defendant must clearly come within the class named in the statute to warrant a conviction. *Forbes Case*, 11 Abb. Prac. 52.

INJUNCTION—TO PREVENT BREACH OF COVENANT NOT TO COMPETE.—Defendants were the owners of a bus line and sold it to the plaintiff. It was stipulated in the bill of sale of the property, that the defendants should not afterwards engage in the same business in the same town. Shortly after the sale had been completed, however, the mother of the defendants purchased other busses, and the defendants have been driving such busses, and practically carrying on the business, as managers for their mother. This bill is brought to enjoin the defendants from breaking their contract not to enter into the business again. Held, that an injunction should be granted. *Holliston v. Ernston* (Minn. 1913) 144 N. W. 415.